

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZERO CARBON HOLDINGS, LLC
and FOUR THIRTEEN, LLC.

Plaintiffs,

v.

ASPIRATION PARTNERS, INC.

Defendant.

23-CV-5262 (LJL)

**JUDGMENT CREDITOR'S FIRST SET OF INTERROGATORIES
TO JUDGMENT DEBTOR**

Judgment Creditor, Aspiration Partners, Inc., by and through its undersigned counsel, propounds the following Interrogatories to Judgment Debtor, Four Thirteen, LLC, pursuant to Rules 33 and 69(a) of the Federal Rules of Civil Procedure in aid of collection of the judgment entered herein on September 20, 2024.

Instructions and Definitions

(a) The following definitions apply to all discovery requests:

1. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

2. The term “document” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

3. When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

4. When referring to documents, “to identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s). In the alternative, the responding party may produce the documents, together with identifying information sufficient to satisfy Fed. R. Civ. P. 33(d).

5. The term “person” is defined as any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

6. The term “concerning” means relating to, referring to, describing, evidencing or constituting.

7. The pronoun “you” refers to the parties to whom these Interrogatories are addressed, and the persons mentioned in clause (b).

8. “Your possession, custody or control,” means within Your possession, custody or control and each person (as defined above) acting or purporting to act on Your behalf, and includes documents which were prepared or obtained by, or placed in the possession, custody or control of any such person within the scope of his or her duties.

9. “Judgment Debtor” means Four Thirteen, LLC, and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

10. “Judgment Creditor” means Aspiration Partners, Inc.

11. Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence and/or occurrences mentioned or complained of in the pleadings.

12. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party’s agents, representatives, employees, and, unless privileged, its attorneys.

(b) The following rules of construction apply to all discovery requests:

1. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.

2. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

3. The use of the singular form of any word includes the plural and vice versa

INTERROGATORIES

1. Identify all bank accounts, investment accounts, brokerage accounts, or other cash accounts in the name of the Judgment Debtor for the years 2023 and 2024. Your answer should include the name of the financial institution and account number for each account.

2. Identify all other assets owned by the Judgment Debtor.

3. Identify any sale and/or transfer of any of your assets from January 1, 2023 through the present. Your answer should include the identity of the asset sold or transferred, the identity of the transferee, and a description of any consideration received by the Judgment Debtor for the sale or transfer.

4. Identify all distributions of profits, salaries, bonuses, compensation, or any other remuneration paid to the members, owners, managers, or officers of the Judgment Debtor during the years 2023 and 2024. Your answer should include the date of each payment, the amount paid, the name of the recipient, and the purpose of the payment.

5. Identify all agents, employees, or representatives of Judgment Debtor who have knowledge of the Judgment Debtor's assets.

6. Identify all persons with whom the person(s) verifying these answers consulted in preparation of such answers and specify with respect to each such person consulted the Interrogatories about which he or she was consulted and identify any additional person(s) who provided information in connection with the preparation of responses to any of these Interrogatories and specify with respect to each such person who provided information the Interrogatory about which he or she provided information.

Dated: October 7, 2024

Respectfully submitted,

/s/ Stephen M. Faraci, Sr.
Stephen M. Faraci, Sr.
New York State Bar No. 5052501
Virginia State Bar No. 42748
WHITEFORD, TAYLOR & PRESTON, L.L.P.
Two James Center
1021 E. Cary Street, Suite 2100
Richmond, Virginia 23219
Telephone: (804) 977-3307
Facsimile: (804) 977-3298
Email: sfaraci@whitefordlaw.com

*Attorneys for Judgment Creditor,
Aspiration Partners, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2024, I served the foregoing *Judgment Creditor's First Set of Interrogatories to Judgment Debtor* by e-mail on the following:

Sean R. O'Brien, Esq.
O'Brien, LLP
900 Third Avenue
18th Floor
New York, NY 10022
Email: sobrien@obrienllp.com

/s/ Stephen M. Faraci, Sr.
Counsel